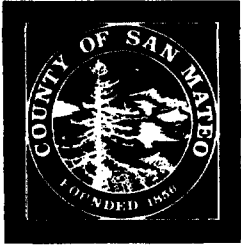


Office of the Sheriff



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AUG 11 1994

DON HORSLEY
SHERIFF

GREGORY MUNKS
UNDERSHERIFF

COUNTY OF SAN MATEO

HALL OF JUSTICE AND RECORDS • REDWOOD CITY • CALIFORNIA 94063

TELEPHONE (415) 599-1665

ADDRESS ALL COMMUNICATIONS TO THE SHERIFF

July 25, 1994

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference; CC Docket Number 92-77

Dear Commissioner Barrett,

As the Sheriff of San Mateo County, California, I am requesting that the Federal Communications Commission exclude local jails from the proposed "billed party preference" system for 0+ Inter LATA pay phone traffic regulations.

Over the years our inmate phone systems have been developed for the inmate environment, meeting many of our security needs and generating much needed revenue. This F.C.C. proposal could have an adverse effect on both those needs for a great number of counties throughout California.

Revenues produced from inmate phone systems help finance many worthwhile programs including adult education, GED, job training classes, substance abuse and family counseling. Recreational and exercise equipment, libraries and staff to manage some of those activities are paid with inmate money. Without telephone revenue most of the programs would cease or be financed with dwindling tax dollars that should be utilized elsewhere. Built-in security measures could also be eliminated, creating a more hostile environment for staff, inmates, and victims of crime.

Please consider the exclusion of jail in the B.P.P. regulations.

Very Truly Yours,

Don Horsley, Sheriff

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0



STATE OF CONNECTICUT

DEPARTMENT OF CORRECTION

340 CAPITOL AVENUE
HARTFORD, CONNECTICUT 06106

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DEPARTMENT OF CORRECTION
HARTFORD, CT

LOWELL P. WEICKER, Jr.
GOVERNOR

LARRY R. MEACHUM
COMMISSIONER

July 29, 1994

DOCKED OFF COPY ORIGINAL

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M. Street, N. W.
Washington, D. C. 20554

Re: Billed Party Preference - CC Docket No. 92-77

Dear Mr. Hundt:

This letter is being written to voice the Connecticut Department of Correction's opposition to Billed Party Preference as it relates to the department's facilities.

At the present time, the Connecticut Department of Correction has added "collect call only telephone" security features at seven of our twenty-six facilities. These security features have greatly improved our ability to detect and curb attempted fraud, abuse and criminal activity. If BPP is enacted, it will certainly undermine our efforts.

As a correctional administrator with thirty years of experience, it is my opinion that the current telephone controls currently in use are adequate and I am opposed to BPP.

Sincerely,


Larry R. Meachum
Commissioner

c: The Honorable James H. Quello
The Honorable Andrew C. Barrett
The Honorable Rachelle B. Chong
The Honorable Susan Ness
The Rev. Mary K. Friskics-Warren

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Larry Rosas

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**PO Box 5323
San Antonio, TX 78201**

July 20, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

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AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

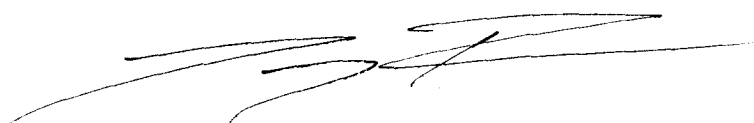
Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,



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Montgomery County Government

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July 29, 1994

AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M. Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference,
CC Docket No. 92-77

Dear Chairman Hundt:

We are opposed to the application of the proposed FCC regulation known as Billed Party Preference. This proposed regulation will allow inmates in correctional facilities to have open access to telecommunications networks for purposes of inmate phone calls. Open access of this nature contravenes correctional security.

Routing inmate telephone calls through a single carrier that has appropriate security features is essential in a correctional facility. Moreover, common practice today is that these single carriers are acquired under a contractual arrangement with government entities, whereby they furnish, install, and maintain the equipment at no charge to the facility. There is revenue to the facility in the form of a percentage commission. This revenue typically is available to offset government cost or goes to an inmate welfare fund to be used to purchase various items of materials and supplies such as recreation equipment.

The security packages available through these single party carriers allow a correctional facility to maintain a level of security on inmate phone calls. These security packages permit phone call time limits, elimination of third party calls, most frequent number called reports, use of NIN numbers restrictions, phone number restrictions, and call monitoring, as legally permissible. These features have been developed by our carrier specifically for correctional use in recognition of the security concerns indigenous to the corrections environment. For example, prior to the utilization of our present carrier, Montgomery County experienced a phone fraud scam by inmates to the cost of \$20,000 dollars to the telephone company. Moreover, a recent newspaper article in the Washington Post described a major drug ring being operated by an inmate out of the Bureau of Prisons facility. It is our feeling that the security features inherent in our present system by our carrier would have prevented these abuses. Since we have had this carrier, we have not experienced any cases of fraud and we have been able, through the reports available, to greatly facilitate investigatory matters.

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List ABCDE

Department of Correction and Rehabilitation

50 Courthouse Square, Room 402, Rockville, Maryland 20850-2320, 301/217-7545, FAX 217-7641, TTY 217-6505

Letter: Billed Party Preference
CC Docket No. 92-77
July 29, 1994
page 2

We believe that the application of BPP (Billed Party Preference) will adversely affect our ability to control the phone program which aids in preventing abuse and fraud, will eliminate a revenue source, will result in increased cost by imposing upon us the requirement to pay for equipment costs, and will eliminate incentives for phone service providers to assist us. Personal phone call program capability is a significant morale builder among inmates. Tension within the facility would increase dramatically without it.

We are sensitive to the rates inmate families must pay for calls. We fully appreciate the FCC's concern if some facilities do not take the responsibility for protecting inmate families from abusive rates. We do not agree that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and let this rate be enforced through the contracts which individual facilities negotiate.

In sum, we believe BPP will take away our ability to address vital security and administrative concerns. We urge you not to adopt regulations which interfere with our administrative and security decisions, decisions that are clearly within our discretion and which we have the public responsibility to make.

Sincerely,



Devon Brown, M.A., M.P.A., J.D.
Director

cc: The Honorable James H. Quello
The Honorable Rachelle B. Chong

The Honorable Andrew C. Barrett
The Honorable Susan Ness

0005y-34-35

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MECOSTA COUNTY SHERIFF DEPARTMENT

HENRY "HANK" WAYER
SHERIFF

AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SPECTATION

JAMES F. STOCKWELL
UNDER SHERIFF

LAWRENCE COX
JAIL ADMINISTRATOR

August 5, 1994

Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C.

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hunt:

This Correctional Facility is opposed to the implementation of Billed Party Preference (BBP) at Jails.

Based on our security needs and the well-being of the citizens of our community, it is obvious to us that we must maintain control of the Vendor/Carrier the inmates in our facility use for phone service.

If the control is taken away from us, we could not afford to supply the necessary equipment to facilitate this service to our inmates, therefore, the service would have to be eliminated due to the loss of funds received from the service.

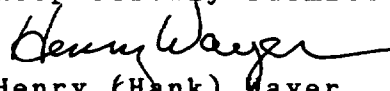
Concerning rates charged to Inmates. We are sensitive to them, in fact, had a vendor overcharging in our opinion, and the rate for calls was reduced to the inmates after we notified the vendor of our concern.

In closing, its important that we maintain control over inmate phone services for several reasons that include: security of our facility, security for the Citizens of our community, and to be able to continue this service to the inmates in our facility.

Thank You very much for your consideration.

No. of Copies rec'd 1
List ABCDE

Respectfully submitted,


Henry (Hank) Wayer
Sheriff


Lawrence Cox
Jail Administrator

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

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AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

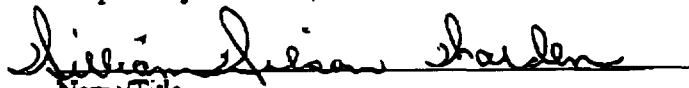
We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,


Name/Title

Bent County Correctional Facility
Name of Correctional Facility

11560 County Rd. FF.75, Las Animas, CO 81054
Address

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AUG 11 1994

The State of Texas
House of Representatives
Austin, Texas

Mary Denny
State Representative
District 63

Capitol Office:
P.O. Box 2910
Austin TX 78768-2910
512-463-0688
District Office:
416 W. University Drive
Suite 200
Denton, TX 76201
817-565-0083
1-800-371-6179

August 1, 1994

The Honorable Andrew C. Barrett, Commissioner
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: Billed Party Preference; CC Docket No. 92-77

Dear Commissioner Barrett:

We have been informed that the FCC is considering the use of a "billed party preference" for 0+interLATA payphone traffic and for other types of operator-assisted interLATA traffic. If BPP system is realized, Inmate Phone Systems, as they are used today, will no longer exist.

The Denton County Sheriff's Department is strongly opposed to BPP for inmate phone systems, the main reason being the control over the calls generated by over 850 inmates in this correctional facility. This Department is committed to protecting law abiding citizens' and victims' rights. The phone system currently being used allows them to control and practically eliminate call abuse and fraud by the inmates, which is a major problem for the victims of crimes as well as family and friends who don't want to be harassed. They would lose the ability to effectively control inmate calls. Implementing BPP would eliminate the revenue-generating agreements that they have with the inmate phone services; revenue that is badly needed. We strongly oppose this program, and earnestly hope that it is not implemented.

Thank you for your serious consideration of my objection to the BPP system.

Very sincerely,

Mary Denny

MD/bf

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List ABCDE _____

0



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August 1, 1994

Steve Magarian
Sheriff

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

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AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
COMMUNICATIONS SECTION

Re: Billed Party Preference; CC Docket No. 92-77

Dear Commissioner Hundt:

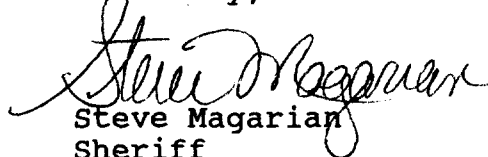
As a California Sheriff and a Jail Administrator, I am asking for your help. It is very important to me and my agency that the Federal Communications Commission exclude local jails from the proposed "Billed Party Preference" system for 0+ LATA pay phone traffic rules.

Billed Party Preference sounds good for the general public but it does not fit jails. If this system is adopted, it could undermine our ability to control inmate calling, eliminate current revenue-sharing arrangements that fund important inmate programs, and will create new financial burdens for our facilities.

It seems that the Federal Communications Commission does not fully understand the impact that their action will have on local detention facilities. Before you make any decision, please stop and listen to the thousands of local jails that will be negatively impacted by your failure to exclude them from the Billed Party Preference system.

Thank you for your attention and consideration of this important matter.

Sincerely,


Steve Magarian
Sheriff

SM:jw

cc: The Honorable James H. Quello, FCC
The Honorable Andrew C. Barrett, FCC
The Honorable Rachelle B. Chong, FCC
The Honorable Susan Ness, FCC
Inmate Phone Service Providers Task Force

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Dedicated to Protect & Serve

TUSCOLA COUNTY
SHERIFF'S DEPARTMENT

THOMAS KERN
SHERIFF



(517) 673-8161

July 30, 1994

DOCKET FILE COPY ORIGINAL
420 COURT STREET • CARO, MICHIGAN 48723

JAMES FYVIE
UNDERSHERIFF

RECEIVED

AUG 11 1994

The Honorable James Barcia
State Senator
1719 Longworth Building
Washington, D.C. 20515

FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE ATTORNEY GENERAL

RE: Billed Party Preference; CC Docket No. 92-77

Dear Jim:

Recently at our National Sheriffs' Conference in Pittsburgh, Pennsylvania, a pending regulatory issue was brought to the attention of all the sheriffs'. It is called the BPP (Billed Party Preference).

Until we went to a private single inmate phone system, we were constantly having problems with inmates harassing people on the phone, etc. Since going with a private vendor we have been able to block harassing type outgoing calls, kept fraud to almost nothing and generated revenue that we desperately need to maintain our facility.

From what I have read I understand that we would lose that revenue, lose blocking control and have the fraud potential back into the system.

I would be opposed to the BPP and ask for your help in doing so.

Sincerely,

A handwritten signature in cursive script that reads "Thomas T. Kern".

Thomas T. Kern
Tuscola County Sheriff

TTK/def

c: The Honorable Reed E. Hundt
The Honorable Andrew C. Barret
The Honorable James H. Quello
The Honorable Rachelle B. Chong
The Honorable Susan Ness

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Carol Vance

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214 Sherri
Universal City, TX 78148

July 20, 1994

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AUG 11 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street NW
Washington DC 20554

Dear Representative Barrett:

As both an employee in the communications industry and a tax paying citizen, I am stating my strong **opposition** to *Billed Party Preference (BPP)* for 0+ Calls. Further, I respectfully request your support in ensuring that Communications Commission Docket 92-77 is defeated.

Confinement facilities are unique and, as such, they require specialized phone system equipment. These systems permit a facility to block an inmate's call to specific numbers, block undesired inbound calls, prevent three-way calling and, overall, reduce fraud and other criminal activity. All of these capabilities are inherent in the equipment which means that, for the most part, intervention by administrative personnel is not required and that the maintenance of security is not jeopardized.

A highly competitive market dictates that the technically sophisticated equipment be installed at little or no cost to the facility and that the provider's commissions be paid to the facility. The commissions facilities receive are a major source of revenue for the inmate welfare funds which finance inmate programs such as family visitation, education and rehabilitation programs. Thus, many of the positive aspects of incarceration are actually being paid for by the inmates.

Succinctly put, most, if not all, of the positive factors derived from the current way of doing business will be discarded if Billed Party Preference becomes a reality. The industry would be going back to the period prior to 1987 when few correctional facilities in the country were paid commissions and many had to pay for their inmate phone service. From a financial point of view, it could be a disaster. Local telephone and long distance companies would no longer have to pay commissions because there would be no competition. Without commissions, facilities would have to turn to their governing body and taxpayers and compete for already scarce resources. Inmate morale funding would be decreased and attended by an increase in inmate control problems. Who would pay for the inmate phone equipment necessary to control calls and prevent fraud and abuse? Again, facilities would have to turn to government sources. Cutting existing programs or increasing taxes would be the requirement to balance budgets. With inmate populations growing at rates estimated from 10 to 15 percent per year, inmate populations could increase by 40 percent by the end of the century. This, of course, will mandate an increase in the number of facilities and manpower to administer them. More inmates and facilities will necessitate more non-revenue producing inmate phone systems if BPP were approved for correctional facilities.

I appeal for your support in **defeating Communications Commission Docket 92-77** with the saying, "If it ain't broke, don't fix it!" Even though inmate phone service is not perfect, a competitive market helps ensure that improvement continues.

Sincerely,

Carol Vance

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STATE OF MARYLAND
DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONAL SERVICES



WILLIAM DONALD SCHAEFER
GOVERNOR

MELVIN A. STEINBERG
LT. GOVERNOR

BISHOP L. ROBINSON
SECRETARY

DIVISION OF CORRECTION
SUITE 311, PLAZA OFFICE CENTER
6776 REISTERSTOWN ROAD
BALTIMORE, MARYLAND 21215-2342
(410) 764-4100
TTY FOR THE DEAF: 486-0677
July 25, 1994

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RICHARD A. LANHAM, SR.
COMMISSIONER

AUG 11 1994

MELANIE C. PEREIRA
DEPUTY COMMISSIONER

The Honorable Andrew C. Barrett
Federal Communications Commission
1919 M Street, N.W.
Washington DC 20554

Re: Billed Party Preference; CC Docket No. 92-77

Dear Mr. Barrett:

Inmate telephone systems should not be subject to Billed Party Preference.


The proposed Billed Party Preference (BPP) means that instead of dealing with one inmate phone service provider that controls and processes all calls from a facility, the inmate calls would be routed over any number of different carriers. BPP will eliminate security controls currently in place and open up the telephone network to excessive fraud. BPP would limit corrections officials authority to control routing of inmate telephone calls, to limit the types of calls, to control whether the calls are handled on an automated basis only or must go to live operators who could be manipulated to place calls the prisoner should not make.

We need a provider who will respond to our needs and will work with us to address the special problems that arise in the inmate environment. We cannot afford to have this control taken away and have prisoner calls routed to just any long distance carrier- and certainly not to a carrier over whom we have no authority or control. Institutional and public safety demand that we maintain control over prisoners access to long distance carriers.

Prison phone service should not be subject to Billed Party Preference. I urge you to reverse the current FCC approval of BPP and preserve the inmate phone service currently utilized in Maryland facilities.

I appreciate your consideration of my comments on this important issue, and I am available to speak with you or your staff if you have questions or need additional information. I may be reached at (410) 764-4186.

Sincerely,


Richard A. Lanham, Sr.
Commissioner

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0



July 26, 1994

Alameda County Sheriff's Department

ALAMEDA COUNTY JAIL-SANTA RITA, 5325 BRODER BLVD., DUBLIN, CA 94568 (415) 551-6500

CHARLES C. PLUMMER, SHERIFF
MARSHAL - CORONER - PUBLIC ADMINISTRATOR
DIRECTOR OF EMERGENCY SERVICES

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AUG 11 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

The Honorable Reed E. Hundt
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Billed Party Preference, CC Docket Number 92-77

Dear Commissioner Hundt:

As Sheriff of Alameda County, and a Jail Administrator, I am requesting that the Federal Communications Commission exclude local jails from the proposed "billed party preference" system for 0+ Inter LATA pay phone traffic rules.

While there may be ways to prevent fraud under B.P.P., we would be losing our ability to closely monitor phone calls during investigations and would likely lose our ability to quickly block calls to protect victims and witnesses from intimidation and family and friends from unwanted calls and harassment. These issues are very important to me and the citizens of Alameda County.

Eliminating the 0+ commissions received quarterly would have the effect of earning a host of unfunded mandates. California jails have Inmate Welfare Funds which are by law to provide for programs, services and facilities for inmates. Telephone commissions are the primary, in some cases sole, source of revenue for the Inmate Welfare Fund. Many of these programs and services are now mandated by law and the courts, primarily the Federal courts. Elimination of commission revenues would force jails to tap already strapped budgets to fund these mandates.

The services and programs provided by the Inmate Welfare Fund includes Adult Education, GED Programs, basic literacy training, job training, substance abuse and family counseling, Chaplains, religious services and many more. Even basics such as supplying indigent inmates with personal hygiene supplies and letter writing material are provided for by this fund.

The revenues from our inmate telephone system could not be replaced. Local government does not have the funds to pay for the many programs financed with these revenues. We purchase recreation and exercise equipment and fund our law libraries along with paying the staff who supervise and manage these programs.

Without telephone revenues, all these programs would end. These are not just programs for the inmates. The education, training and counseling provided help these people become productive, law abiding individuals rather than a burden to the taxpayers.

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Billed Party Preference, CC Docket Number 92-77

July 26, 1994

Page 2

Before you make any decision, please stop and listen to the thousands of local jails that will be dramatically and adversely impacted by your failure to exclude them from the B.P.P. System.

Sincerely,

A handwritten signature in cursive script, appearing to read "C. Plummer", with a horizontal line drawn through the middle of the signature.

400

Charles C. Plummer
Sheriff/Coroner

Henry County Commissioners

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COPY



AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COURTHOUSE
660 N. PERRY
BOX 546
NAPOLEON, OHIO
43545-0546

Ph. (419) 592-4876
(419) 592-1903

BOARD OF COUNTY COMMISSIONERS:

Rita M. Franz
Richard J. Bennett
Richard C. Bertz

CLERK:

Vicki R. Glick

OFFICE HOURS:

Monday - Friday
8:00 a.m. - 4:30 p.m.

MEETING TIME:

Monday
9:00 a.m. - 4:00 p.m.
Thursday
9:00 a.m. - 12:00 p.m.

August 1, 1994

The Honorable Reed E. Hundt, Chairman
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

With the Corrections Commission of Northwest Ohio they have found it necessary to route inmate calls from the facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our responsibility to coordinate inmate calls through a carrier CCNO knows and trusts. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to CCNO and few that will be trained to handle inmate calls. Criminal behavior with the phones will be uncontrollable.

In short, BPP would take away CCNO's ability to employ important security and administrative measures that CCNO has found to be necessary at their facility. We urge you to not adopt regulations that interfere with their administrative and security decisions - decisions that are clearly within CCNO's discretion and which they have a public responsibility to make.

Approving such legislation as BPP, as currently written, will also enable such inmate advocate groups to pursue other legislative agendas that exceed the intent of current case law, prisoner rights as guaranteed by our forefathers in the constitution and would encourage you to ignore what the professionals in the corrections field need to protect the public.

Sincerely,

HENRY COUNTY COMMISSIONERS

Richard J. Bennett

Richard C. Bertz

Rita M. Franz

pc: The Honorable James H. Quello
The Honorable Rachelle B. Chong

No. of Copies rec'd 1
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✓ The Honorable Andrew C. Barrett
The Honorable Susan Ness

COMMISSIONER PRECINCT 2
DENTON COUNTY GOVERNMENT CENTER
3740 NORTH JOSEY LANE - SUITE 200
CARROLLTON, TEXAS 75007
(214) 492-0139
FAX (214) 394-4097



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COMMISSIONERS COURT
COURTHOUSE-ON-THE-SQUARE
110 W. HICKORY
DENTON, TEXAS 76201
1-800-346-3189
FAX (817) 382-0845

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SANDY JACOBS
DENTON COUNTY COMMISSIONER

AUG 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

July 27, 1994

The Honorable Andrew Barrett
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

RE: Billed Party Preference; CC Docket No. 92-77

Dear Mr. Barrett,

It has been brought to my attention that the Federal Communications Commission is in the process of considering a "billed party preference" for O+ inter LATA payphone traffic. Our county facility generates calls by over 850 inmates in our jail. Currently we have a phone system that allows the Sheriff to effectively control call abuse and fraud by the inmates. If the BPP is implemented there is concern that the Inmate Phone Systems, such as the one we use, will no longer exist.

It is my understanding that implementing BPP would eliminate the revenue-generating agreements that the county has in place with the inmate phone services. This revenue is used to provide educational and rehabilitation program for the inmates. Be assured that our contract for phone services specifies that the inmates pay no more than the standard GTE and ATT rates.

I am opposed to the implementation of a "billed party preference" that would make changes in our Inmate Phone System. Thank you for your consideration.

Sincerely,

Sandy Jacobs
Denton County Commissioner

cc: Weldon Lucas, Denton County Sheriff

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